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Lead Counsel for the Indirect-Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. 3:07-cv-5944 SC

MDL No. 1917

This Document Relates to:

Indirect-Purchaser Class Action

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al., No. 13-cv-1173;

Sharp Elecs. Corp. v. Koninklijke Philips Elecs. N.V., No. 13-cv-02776;

Siegel v. Hitachi, Ltd., No. 11-cv-05502;

Siegel v. Technicolor SA, et al., No. 13-cv-05261;

Best Buy Co., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513;

Best Buy Co., et al. v. Technicolor SA, et al., No. 13-cv-05264;

Target Corp. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514;

Target Corp. v. Technicolor SA, et al., No. 13-cv-05686;

DECLARATION OF GERARD A. DEVER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION *IN LIMINE* NO. 12:

TO EXCLUDE PLAINTIFFS' "PRICE LADDER" THEORY OF RECOVERY

1 *Sears, Roebuck and Co. and Kmart Corp. v.*)
2 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-)
3 05514;)
4 *Sears, Roebuck and Co. and Kmart Corp. v.*)
5 *Technicolor SA*, No. 13-cv-05262;)
6 *Viewsonic Corp. v. Chunghwa Picture Tubes,*)
7 *Ltd.* No. 14-cv-02510.)
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1 I, Gerard A. Dever, hereby declare and state as follows:

2 1. I am a member of the law firm Fine, Kaplan and Black, R.P.C., counsel for the
3 Indirect Purchaser Plaintiffs in the above-captioned action currently pending in the U.S. District
4 Court for the Northern District of California. I am a member in good standing of the bar of the
5 Commonwealth of Pennsylvania and I am admitted *pro hac vice* to practice before this Court. I
6 submit this Declaration in support of Indirect Purchaser Plaintiffs' Response to Defendants'
7 Motion *In Limine* No. 12 to Exclude Plaintiffs' "Price Ladder" Theory of Recovery.

8 1. Attached hereto as **Exhibit 1** is excerpts from the deposition of Chih Chun Liu
9 dated February 20, 2013.

10 2. Attached hereto as **Exhibit 2** is a true and correct copy and certified translation of a
11 11/2/2005 Contact Report (CHU00014218).

12 3. Attached hereto as **Exhibit 3** is a true and correct copy and certified translation of a
13 10/27/1999 Visitation Report (CHU00029171E-74E).

14 4. I declare under penalty of perjury under the laws of the United States that the
15 foregoing is true and correct.

16 Executed on February 27, 2015, in Philadelphia, Pennsylvania.

17
18 /s/ Gerard A. Dever

19 Gerard A. Dever

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